IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

DAVID ALLEN MCVICKER, SR

aka David Allen McVicker : CASE NO. 1:19-bk-01346

STEPHANIE ANN MCVICKER

fka Stephanie Ann Fogle :

Debtors :

:

Nationstar Mortgage LLC d/b/a Mr. Cooper :

Movant :

:

DAVID ALLEN MCVICKER, SR aka David Allen McVicker :

STEPHANIE ANN MCVICKER: the Stephanie Ann Fogle:

Respondents :

ANSWER TO MOTION FOR RELIEF FROM STAY

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
- 6. The Debtors lack knowledge or information, such as a pay off statement, sufficient to form a belief as to the truth of this averment, and therefore deny the same.
- 7. Admitted that the Debtors fell behind. Mr. McVicker was ill which caused him to miss work and fall behind; however, they intend to cure the arrearages through an amended plan.
- 8. Admitted that is the approximate amount due.
- 9. Denied. See response to paragraph 7.
- 10. The Debtors lack knowledge or information sufficient to form a belief as to the truth of this averment, and therefore deny the same.

11. The Debtors lack knowledge or information sufficient to form a belief as to the truth of this averment, and therefore deny the same.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
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